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**UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

AMANDA HOUGHTON, CHARLES  
DOUGLAS, and SUSAN FRANKLIN, on  
behalf of all others similarly situated,

Plaintiffs,

v.

COMPOUND DAO, a California general  
partnership; ROBERT LESHNER;  
GEOFFREY HAYES; AH CAPITAL  
MANAGEMENT, LLC; POLYCHAIN  
ALCHEMY, LLC; BAIN CAPITAL  
VENTURES (GP); GAUNTLET  
NETWORKS, INC; PARADIGM  
OPERATIONS LP,

Defendants.

CASE NO.: 3:22-cv-07781-WHO

Judge: Hon. William H. Orrick III  
Complaint Filed: December 8, 2022

**JOINT STIPULATION AND  
ORDER (1) EXTENDING TIME TO  
RESPOND TO COMPLAINT (2)  
VACATING CASE MANAGEMENT  
CONFERENCE AND (3) VACATING  
ADR DEADLINES**

1 Plaintiffs Amanda Houghton, Charles Douglas, and Susan Franklin, individually and on  
 2 behalf of all others similarly situated (the “Plaintiffs”), and Defendants Robert Leshner, Geoffrey  
 3 Hayes, AH Capital Management, LLC, Polychain Alchemy, LLC, Bain Capital Ventures (GP),  
 4 Gauntlet Networks, Inc. and Paradigm Operations LP hereby stipulate and agree as follows:

5 WHEREAS, on December 8, 2022, Plaintiffs filed the complaint in the above-captioned  
 6 action (“Action”), a putative class action arising under Sections 5 and 12(a)(1) of the Securities Act  
 7 of 1933 (“Securities Act”), including the Private Securities Litigation Reform Act of 1995 (the  
 8 “PLSRA”), 15 U.S.C. § 78u-4, among other claims, against Compound DAO, AH Capital  
 9 Management, LLC, Polychain Alchemy, LLC, Bain Capital Ventures (GP), Gauntlet Networks, Inc.,  
 10 Paradigm Operations LP, Robert Leshner and Geoffrey Hayes (the “Defendants”);

11 WHEREAS, Section 12D(a)(3)(A)(i) of the PSLRA, 15 U.S.C. 78u-4(a)(3)(A)(i), requires a  
 12 plaintiff to cause a public notice to be published within 20 days of filing a putative class action that  
 13 arises under the PSLRA, which notice Plaintiffs published on December 9, 2022;

14 WHEREAS, any purported class member has 60 days from the date the notice was published  
 15 to move the Court to serve as lead plaintiff on behalf of the putative class, 15 U.S.C. § 78u-  
 16 4(a)(3)(A)(i)(II);

17 WHEREAS, the Court must appoint a lead plaintiff no later than 90 days after the notice was  
 18 published, 15 U.S.C. § 78u-4(a)(3)(B)(i);

19 WHEREAS, once selected, the lead plaintiff will then select lead counsel, subject to the  
 20 Court’s approval, 15 U.S.C. § 78u-4(a)(3)(B)(v), and identify an operative complaint or file an  
 21 amended complaint that becomes the operative complaint;

22 WHEREAS, on December 9, 2022, the Court entered an Order setting an Initial Case  
 23 Management Conference (“CMC”) for March 14, 2023 at 2:00 p.m. (Dkt. No. 9);

24 WHEREAS, the parties agree that, in the interests of judicial economy, conservation of time  
 25 and resources, and orderly management of this Action, no response to any pleading in this Action,  
 26 including any motion brought pursuant to Federal Rule of Civil Procedure 12, should occur until  
 27 after the Court appoints a lead plaintiff and lead counsel pursuant to the PSLRA and an amended  
 28

1 complaint is filed or an operative complaint is identified;

2 WHEREAS, the parties agree that the Case Management Conference and all associated  
3 deadlines, including all ADR Multi-Option Program deadlines, should be continued until the Court  
4 has appointed lead plaintiff and lead counsel and decided Defendants' forthcoming motion to  
5 dismiss; and

6 WHEREAS, there have been no previous time modifications in this case;

7 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, pursuant to Civil Local  
8 Rules 6-1(b), 6-2 and 7-12, by an between the undersigned counsel for the undersigned parties,  
9 subject to Court approval, as follows:

10 1. No Defendant who is a party to this stipulation is required to respond to the complaint  
11 previously filed in this Action.

12 2. The Court mandated ADR Multi-Option program deadlines are vacated and reset after  
13 the Court's ruling on any motion to dismiss the amended complaint or any other motion to dismiss  
14 that may be subsequently filed.

15 3. The Case Management Conference currently scheduled for March 14, 2023 at 2:00  
16 PM shall be vacated and rescheduled to a date of the Court's choosing after its ruling on any motion  
17 to dismiss the amended complaint or any other motion to dismiss that may be subsequently filed.

18 4. Following an order on the forthcoming lead plaintiff motions, counsel for Defendants  
19 and Court-appointed lead counsel agree to promptly meet and confer and, within 14 days of the order,  
20 jointly submit a proposed schedule regarding the filing of an amended complaint, Defendants'  
21 response thereto, and all associated briefing, consistent with the Court's order appointing such lead  
22 plaintiff(s) and lead counsel.

23 5. Nothing herein shall be deemed to constitute a waiver of any rights, defenses,  
24 objections or any other application to any court that any party may have with respect to the claims  
25 set forth in the complaint filed in this Action.

1 DATED: December 29, 2022

JASON HARROW  
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2  
3 /s/ Jason Harrow  
Attorney for Plaintiffs  
4 AMANDA HOUGHTON, CHARLES DOUGLAS, and  
5 SUSAN FRANKLIN, on behalf of themselves and all others  
similar situated

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17 *and Gauntlet Networks, Inc.*

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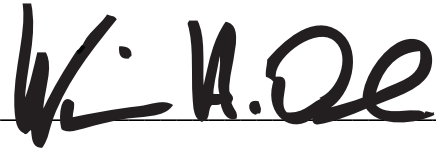
Facsimile: (213) 687-5600

*Attorneys for Defendant Paradigm Operations LP*

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED**

2 Dated: December 29, 2022

3 By: \_\_\_\_\_



4 HONORABLE WILLIAM H. ORRICK III  
5 UNITED STATES DISTRICT JUDGE  
6  
7  
8

9 **FILER'S ATTESTATION**

10 I, Peter B. Morrison, am the ECF User whose ID and password are being used to file this  
11 Joint Stipulation Adjourning Sine Dine the Time to Respond to Complaint and the Scheduled Case  
12 Management Conference. In compliance with Civil Local Rule 5-1(i), I hereby attest that  
13 concurrence in the filing of this document have been obtained from each of the other signatories.  
14

15 By: /s/ Peter B. Morrison  
16 Peter B. Morrison  
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